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May 3, 2023

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*, No. 23 Civ. 1471 (JMF)

Your Honor:

I am an attorney at Beldock Levine & Hoffman LLP, counsel for Plaintiffs in the above-referenced action. The action was brought pursuant to the Freedom of Information Act ("FOIA") following Defendant's failure to respond to Plaintiffs' FOIA request seeking "a copy of the index to all birth and death records held by the State Department for the Panama Canal Zone." On March 7, 2023, the parties requested permission to submit a status letter by May 5, 2023, which would also propose a schedule for the processing of any responsive documents found by the Defendant or contain their positions with respect to any outstanding issues should the parties be unable to reach an agreement. (Dkt. No. 11)

Since then, on April 13, 2023, Defendant provided its response to Plaintiffs' FOIA request, stating that it conducted searches and found no responsive records. The parties have since discussed the request and Defendant's response, and Plaintiffs anticipate providing Defendant with additional materials and information to address Plaintiffs' questions regarding Defendant's response. Defendant's answer is currently due on May 26, 2023.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Jesse M. Furman

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We thank the Court for its attention to this matter.

Respectfully submitted,

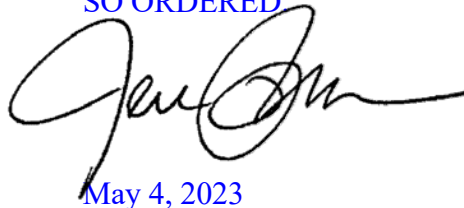
A handwritten signature in black ink, appearing to read "Jeff Kinkle", written in a cursive style.

Jeffrey F. Kinkle

cc: Defendant's counsel (by ECF)

The parties shall submit a joint update letter, no later than **May 25, 2023**, and not to exceed two pages, indicating whether there is any need for discovery or an initial conference and, if not, proposing a briefing schedule for any motions, including motions for summary judgment.

SO ORDERED

A handwritten signature in black ink, appearing to read "Jesse M. Furman", written in a cursive style.

May 4, 2023